

KOCH ♦ LAW

ATTORNEY AT LAW

September 7, 2021

Hon. Victor Marrero
United States District Court
Southern District of New York
500 Pearl St., Courtroom 15B
New York, NY 10007-1312

USDC SDNY
DOCUMENT
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DATE FILED: 9/9/2021

**Re: Bail Modification – Amended
United States v. Lucian Rogers
1:19-cr-00627-VM-8**

VIA CM/ECF

Dear Judge Marrero:

I respectfully request a modification to remove Mr. Rogers's curfew restrictions from the current curfew of 10:00 PM to 9:00 AM with location monitoring to allow him to work overnight from Sunday to Thursday from 9:00 PM to 5:00 AM as a licensed OSHA warehouse worker at Foodirect Inc. located at 355 Food Center Drive, Building C1-C14, Bronx, NY 10474. I have attached Mr. Rogers's employment letter (redacted email and phone number can be provided on request).

Mr. Rogers has adhered to his bail conditions in 2021 without incident. During this time, he has moved from a seasonal job at UPS doing deliveries to a construction career using his licensing and over 50 hours of OSHA training with certifications. Mr. Rogers was able to acquire and maintain permanent employment with Analytic Construction Corporation due to his commitment to his training and expertise in acquiring a 30-hour Construction Safety and Health Card, 8-Hour Fall Prevention certification, and 2-Hour Drug and Alcohol Awareness certification. Other certifications Mr. Rogers has achieved include two certificates totaling 24 hours of security guard training certified by the New York Security Guard Advisory Counsel.

I have spoken with AUSA Rothman (the Government) and PSO Joshua Rothman (Mr. Rogers's Supervision Specialist). The Government and Pre-Trial do not object to this request to remove location monitoring and curfew. I kindly ask your Honor to take into consideration Mr. Rogers's adherence to his present bail conditions without issue since our last bail hearing on December 28th, 2020.

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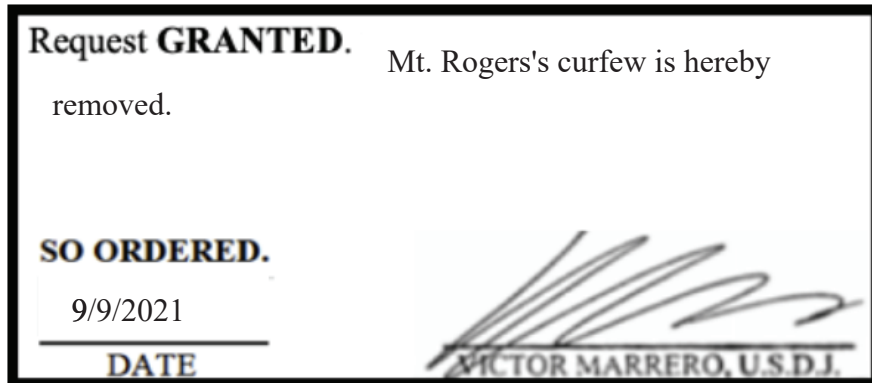
Respectfully,

/s/

Lee Koch

cc: All Counsel of Record (via CM/ECF)

cc: E-mailed to Specialist Josh Rothman



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September 2, 2021

To Whom It May Concern

I am writing this letter on behalf of Lucian Rogers. We at Foodirect Inc. would like to give the opportunity to Mr. Rogers to have a great career at our company. His schedule will be Sunday nights thru Thursday night from 9pm – 5am for training. Due to Hoilday he will not work Sunday but will be in Monday night. If anything, feel free to contact me at [REDACTED]



Phillip Casanova

A handwritten signature in blue ink that reads "Phillip Casanova".

Foodirect Inc.

Warehouse General Manager

[REDACTED]

[REDACTED]

[Http://www.foodirect.com](http://www.foodirect.com)